

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

2017 JUN -6 AM 8:55

CHONG SOH,

: CASE NO. \_\_\_\_

CLERK OF COURT  
AT BALTIMORE

Plaintiff,

:

**JFM 17 CV 1544**

BY \_\_\_\_\_ DEPUTY

v.

:

**NOTICE OF REMOVAL**

NATIONAL ENTERPRISE SYSTEMS,

:

Defendant.

:

Now comes National Enterprise Systems, Inc., pursuant to 28 U.S.C. §§ 1331, 28 U.S.C. § 1441 and 15 U.S.C. § 1681, et seq., and files this Notice of Removal, and in support hereof sets forth the following grounds:

1. On May 8, 2017, Defendant was served with Plaintiff's Complaint, a copy of which is attached hereto, in an action entitled Chong Sott [sic] v. National Enterprise Systems, Inc. filed of record with the Clerk of Courts for the District Court of Maryland for Howard County, Case No. 1001-0001989-2017.
2. Plaintiff's Complaint purports to set forth a cause of action under the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq.
3. This Court has original jurisdiction over Plaintiff's cause of action based upon 28 U.S.C. § 1331 and 15 U.S.C. § 1681, et seq. Pursuant to 28 U.S.C. § 1441, therefore, the civil action pending in the District Court of Maryland for Howard County is removable to this Court.
4. Defendant will file its Answer to Plaintiff's Complaint with this Court within seven (7) days of the filing of this Notice of Removal.
5. Thirty (30) days have not yet expired since receipt of Plaintiff's Complaint.
6. Copies of all process, pleadings and orders served upon Defendant in this action are attached hereto.
7. Defendant has provided written notice of the filing of this Notice of Removal to Plaintiff by ordinary mail on this date and has also forwarded a Notice for filing with the Clerk of Courts for the District Court of Maryland for Howard County regarding this Notice of Removal.

WHEREFORE, Defendant prays that the above-captioned action now pending in the District Court of Maryland for Howard County be removed therefrom and placed on the regular docket of the United States District Court for the District of Maryland.

Respectfully submitted,

/s/  
James M. Connolly (Bar No. 23872)  
*Kramer & Connolly*  
465 Main St.  
Reisterstown, MD 21136  
Tel.: (410) 581-0070  
Fax: (410) 581-1524  
jmc@kramerslaw.com

Counsel for Defendant National Enterprise Systems,  
Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on June 5, 2017, a copy of this Notice of Removal with attachments was mailed first-class, postage prepaid, to:

Mr. Chong Soh  
5501 Seminary Rd., Unit 4055  
Falls Church, VA 22041

/s/  
James M. Connolly